1 JAN DAVID KAROWSKY 2 Attorney at Law A Professional Corporation 3 California State Bar Number 53854 716 19th Street, Suite 100 4 Sacramento, CA 95811-1767 KarowskyLaw@sbcglobal.net (916) 447-1134 (916) 448-0265 (Fax) 6 Attorney for Defendant 7 Christopher King 8 UNITED STATES DISTRICT COURT 9 IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA 10 11 United States of America, Case No. Cr.S-24-CR-120-DC 12 Plaintiff, 13 STIPULATION TO CONTINUE STATUS VS. **CONFERENCE AND ORDER** 14 Christopher King, Date: April 25, 2025 15 Time: 9:30 a.m. Defendant **Court: Hon. Dena Coggins** 16 17 18 19 20 IT IS HEREBY STIPULATED, by and between the parties, through their respective 21 counsel, Assistant United States Attorney Whitnee Goins, counsel for plaintiff, and recently 22 appointed CJA attorney, Jan David Karowsky, counsel for defendant Christopher King, that the 23 status conference scheduled for April 25, 2025 at 9:30 a.m., be continued to June 13, 2025, at 24 9:30 a.m. 25

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1 Defense counsel was just recently appointed to substitute in for the Federal Defender's 2 Office and requires additional time to review discovery; to undertake significant investigation; 3 meet with the client; and determine if expert consultation, examination and a report is 4 appropriate and necessary. Additionally, the government recently provided defense counsel with 5 proposed plea agreement terms. Defense counsel will need time to discuss the proposed terms 6 with his client. 7 The requested continuance will allow for the time necessary for the defense to conduct its 8 investigation and for the defendant to determine how best to proceed in this case. 9 Accordingly, the parties request that the status conference in this matter be reset to June 10 13, 2025 at 9:30 a.m. The parties agree that the ends of justice served by resetting the status 11 conference date outweigh the best interest of the public and the defendant in a speedy trial. 12 Therefore, the parties agree that time is excludable from April 25, 2025 through June 13, 13 2025, pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). 14 Dated: April 10, 2025 Respectfully submitted, 15 MICHELE BECKWITH Acting United States Attorney 16 /s/ WHITNEE GOINS 17 18 WHITNEE GOINS Assistant United States Attorney 19 DATED: April 10, 2025 JAN DAVID KAROWSKY 20 Attorney at Law 21 A Professional Corporation 22 /s/ Jan David Karowsky 23 by JAN DAVID KAROWSKY 24 Attorney for Defendant **Christopher King** 25

<u>ORDER</u>

IT IS HEREBY ORDERED that the status conference scheduled for April 25, 2025, at 9:30 a.m. is continued to June 13, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. The time period between April 25, 2025 and June 13, 2025 is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **April 10, 2025**

Dena Coggins

United States District Judge